

# EXHIBIT 1

**From:** [Edgar Gonzalez](#)  
**To:** "Kelly Ransom"; [Steve Ravel](#)  
**Cc:** [Caitlyn Hubbard](#); [Todd Patterson](#); [Jay Yates](#); [Kyrie Cameron](#); [Jordan Brown](#); [Garrett Anderson](#); [Matt Graham](#); [Angela Grohs](#)  
**Bcc:** [Edgar Gonzalez](#)  
**Subject:** RE: [CloudofChange v. Clover] Draft Agreed Protective Order  
**Date:** Friday, December 23, 2022 10:33:14 AM  
**Attachments:** [image003.png](#)

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Kelly and Steve,

Thanks for meeting with us yesterday. In light of (1) Clover's decision to continue pursuing its motion to stay; (2) discovery deadlines associated with Clover's motion to transfer; and (3) Clover's discovery dispute related to depositions and written discovery for jurisdictional/venue discovery, CloudofChange opposes Clover's request for an extension of its answer due on December 27, 2022.

While we normally would extend the professional courtesy to accommodate opposing counsel's request (as we have with Clover earlier in this case on at least two occasions), Clover's current and upcoming motions that you shared at our conference force us to continue to diligently move forward with the case so that our client's interests are not negatively impacted. We trust that Clover has adequately prepared for the current answer due date given that we filed our amended complaint on Dec. 12, 2022 (12 days ago including today).

We note that Clover's intent to seek a protective order today regarding jurisdictional/venue discovery puts our team in a similar position of having to address this issue over the holidays without an extension given our need to move forward with the case.

Alternatively, CloudofChange would be happy to discuss the extension should Clover decide to drop its motion to stay the case. We are available to discuss this option today at your convenience.

Thanks, and happy holidays.

Best regards,  
Edgar

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**From:** Kelly Ransom <[Kelly.Ransom@kellyhart.com](mailto:Kelly.Ransom@kellyhart.com)>  
**Sent:** Thursday, December 22, 2022 2:34 PM  
**To:** Edgar Gonzalez <[EGonzalez@pattersonsheridan.com](mailto:EGonzalez@pattersonsheridan.com)>  
**Cc:** Caitlyn Hubbard <[Caitlyn.Hubbard@kellyhart.com](mailto:Caitlyn.Hubbard@kellyhart.com)>; Todd Patterson <[TPatterson@pattersonsheridan.com](mailto:TPatterson@pattersonsheridan.com)>; Jay Yates <[JYates@pattersonsheridan.com](mailto:JYates@pattersonsheridan.com)>; Kyrie Cameron <[KCameron@pattersonsheridan.com](mailto:KCameron@pattersonsheridan.com)>; Jordan Brown <[JBrown@pattersonsheridan.com](mailto:JBrown@pattersonsheridan.com)>; Garrett Anderson <[GAnderson@pattersonsheridan.com](mailto:GAnderson@pattersonsheridan.com)>; Matt Graham <[MGraham@pattersonsheridan.com](mailto:MGraham@pattersonsheridan.com)>; Angela Grohs <[AGrohs@pattersonsheridan.com](mailto:AGrohs@pattersonsheridan.com)>; Steve Ravel

<steve.ravel@kellyhart.com>

**Subject:** RE: [CloudofChange v. Clover] Draft Agreed Protective Order

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Hi Edgar,

We are available at 3 CT today.

**Kelly Ransom**

Partner

*Licensed to Practice in Louisiana, Texas, and Alabama*



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**From:** Edgar Gonzalez <[EGonzalez@pattersonsheridan.com](mailto:EGonzalez@pattersonsheridan.com)>

**Sent:** Thursday, December 22, 2022 1:23 PM

**To:** Kelly Ransom <[Kelly.Ransom@kellyhart.com](mailto:Kelly.Ransom@kellyhart.com)>

**Cc:** Caitlyn Hubbard <[Caitlyn.Hubbard@kellyhart.com](mailto:Caitlyn.Hubbard@kellyhart.com)>; Todd Patterson <[TPatterson@pattersonsheridan.com](mailto:TPatterson@pattersonsheridan.com)>; Jay Yates <[JYates@pattersonsheridan.com](mailto:JYates@pattersonsheridan.com)>; Kyrie Cameron <[KCameron@pattersonsheridan.com](mailto:KCameron@pattersonsheridan.com)>; Jordan Brown <[JBrown@pattersonsheridan.com](mailto:JBrown@pattersonsheridan.com)>; Garrett Anderson <[GAnderson@pattersonsheridan.com](mailto:GAnderson@pattersonsheridan.com)>; Matt Graham <[MGraham@pattersonsheridan.com](mailto:MGraham@pattersonsheridan.com)>; Angela Grohs <[AGrohs@pattersonsheridan.com](mailto:AGrohs@pattersonsheridan.com)>; Steve Ravel <[steve.ravel@kellyhart.com](mailto:steve.ravel@kellyhart.com)>

**Subject:** RE: [CloudofChange v. Clover] Draft Agreed Protective Order

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Thanks, Kelly.

Best regards,  
Edgar

**Edgar Gonzalez** • Associate

**PATTERSON + SHERIDAN LLP**

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**From:** Kelly Ransom <[Kelly.Ransom@kellyhart.com](mailto:Kelly.Ransom@kellyhart.com)>

**Sent:** Thursday, December 22, 2022 1:22 PM

**To:** Edgar Gonzalez <[EGonzalez@pattersonsheridan.com](mailto:EGonzalez@pattersonsheridan.com)>; Steve Ravel <[steve.ravel@kellyhart.com](mailto:steve.ravel@kellyhart.com)>

**Cc:** Caitlyn Hubbard <[Caitlyn.Hubbard@kellyhart.com](mailto:Caitlyn.Hubbard@kellyhart.com)>; Todd Patterson <[TPatterson@pattersonsheridan.com](mailto:TPatterson@pattersonsheridan.com)>; Jay Yates <[JYates@pattersonsheridan.com](mailto:JYates@pattersonsheridan.com)>; Kyrie Cameron <[KCameron@pattersonsheridan.com](mailto:KCameron@pattersonsheridan.com)>; Jordan Brown <[JBrown@pattersonsheridan.com](mailto:JBrown@pattersonsheridan.com)>; Garrett Anderson <[GAnderson@pattersonsheridan.com](mailto:GAnderson@pattersonsheridan.com)>; Matt Graham <[MGraham@pattersonsheridan.com](mailto:MGraham@pattersonsheridan.com)>; Angela Grohs <[AGrohs@pattersonsheridan.com](mailto:AGrohs@pattersonsheridan.com)>

**Subject:** RE: [CloudofChange v. Clover] Draft Agreed Protective Order

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Hi Edgar,

We are tied up until later this afternoon but I will get back to you regarding our availability by 3 pm CT.

**Kelly Ransom**

Partner

*Licensed to Practice in Louisiana, Texas, and Alabama*



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**From:** Edgar Gonzalez <[EGonzalez@pattersonsheridan.com](mailto:EGonzalez@pattersonsheridan.com)>

**Sent:** Wednesday, December 21, 2022 2:25 PM

**To:** Steve Ravel <[steve.ravel@kellyhart.com](mailto:steve.ravel@kellyhart.com)>

**Cc:** Kelly Ransom <[Kelly.Ransom@kellyhart.com](mailto:Kelly.Ransom@kellyhart.com)>; Caitlyn Hubbard <[Caitlyn.Hubbard@kellyhart.com](mailto:Caitlyn.Hubbard@kellyhart.com)>; Todd Patterson <[TPatterson@pattersonsheridan.com](mailto:TPatterson@pattersonsheridan.com)>; Jay Yates <[JYates@pattersonsheridan.com](mailto:JYates@pattersonsheridan.com)>; Kyrie Cameron <[KCameron@pattersonsheridan.com](mailto:KCameron@pattersonsheridan.com)>; Jordan Brown <[JBrown@pattersonsheridan.com](mailto:JBrown@pattersonsheridan.com)>; Garrett Anderson <[GAnderson@pattersonsheridan.com](mailto:GAnderson@pattersonsheridan.com)>; Matt Graham <[MGraham@pattersonsheridan.com](mailto:MGraham@pattersonsheridan.com)>; Angela Grohs <[AGrohs@pattersonsheridan.com](mailto:AGrohs@pattersonsheridan.com)>

**Subject:** Re: [CloudofChange v. Clover] Draft Agreed Protective Order

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Tomorrow afternoon works for us. Does 2:00 PM CT work?

Best regards,  
Edgar

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On Dec 21, 2022, at 14:09, Steve Ravel <[steve.ravel@kellyhart.com](mailto:steve.ravel@kellyhart.com)> wrote:

<0.jpg>

I've had something come up. How does tomorrow afternoon look?

---

**From:** Steve Ravel  
**Sent:** Wednesday, December 21, 2022 12:39 PM  
**To:** 'Edgar Gonzalez' <[EGonzalez@pattersonsheridan.com](mailto:EGonzalez@pattersonsheridan.com)>; Kelly Ransom <[Kelly.Ransom@kellyhart.com](mailto:Kelly.Ransom@kellyhart.com)>; Caitlyn Hubbard <[Caitlyn.Hubbard@kellyhart.com](mailto:Caitlyn.Hubbard@kellyhart.com)>  
**Cc:** Todd Patterson <[TPatterson@pattersonsheridan.com](mailto:TPatterson@pattersonsheridan.com)>; Jay Yates <[JYates@pattersonsheridan.com](mailto:JYates@pattersonsheridan.com)>; Kyrie Cameron <[KCameron@pattersonsheridan.com](mailto:KCameron@pattersonsheridan.com)>; Jordan Brown <[JBrown@pattersonsheridan.com](mailto:JBrown@pattersonsheridan.com)>; Garrett Anderson <[GAnderson@pattersonsheridan.com](mailto:GAnderson@pattersonsheridan.com)>; Matt Graham <[MGraham@pattersonsheridan.com](mailto:MGraham@pattersonsheridan.com)>; Angela Grohs <[AGrohs@pattersonsheridan.com](mailto:AGrohs@pattersonsheridan.com)>  
**Subject:** RE: [CloudofChange v. Clover] Draft Agreed Protective Order

Hey Kelly,

Do you have time to chat with "Jay's posse" or some sub-set of it around 4 this afternoon?

---

**From:** Edgar Gonzalez <[EGonzalez@pattersonsheridan.com](mailto:EGonzalez@pattersonsheridan.com)>  
**Sent:** Wednesday, December 21, 2022 12:10 PM  
**To:** Steve Ravel <[steve.ravel@kellyhart.com](mailto:steve.ravel@kellyhart.com)>; Kelly Ransom <[Kelly.Ransom@kellyhart.com](mailto:Kelly.Ransom@kellyhart.com)>; Caitlyn Hubbard <[Caitlyn.Hubbard@kellyhart.com](mailto:Caitlyn.Hubbard@kellyhart.com)>  
**Cc:** Todd Patterson <[TPatterson@pattersonsheridan.com](mailto:TPatterson@pattersonsheridan.com)>; Jay Yates <[JYates@pattersonsheridan.com](mailto:JYates@pattersonsheridan.com)>; Kyrie Cameron <[KCameron@pattersonsheridan.com](mailto:KCameron@pattersonsheridan.com)>; Jordan Brown <[JBrown@pattersonsheridan.com](mailto:JBrown@pattersonsheridan.com)>; Garrett Anderson <[GAnderson@pattersonsheridan.com](mailto:GAnderson@pattersonsheridan.com)>; Matt Graham <[MGraham@pattersonsheridan.com](mailto:MGraham@pattersonsheridan.com)>; Angela Grohs <[AGrohs@pattersonsheridan.com](mailto:AGrohs@pattersonsheridan.com)>  
**Subject:** RE: [CloudofChange v. Clover] Draft Agreed Protective Order

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Glad to hear you are always happy to speak with us. The feeling is mutual.

We hoped to have a short conversation to prevent any need for a protracted email exchange or parties reaching out to the Court before conferring on potential joint issues (e.g., requesting a hearing), which we think would be "out of the ordinary."

With respect to deposition notices, we would like to confirm logistics (e.g., dates, locations). On the PO, we do not anticipate any issues, but thought it would be efficient to have a preliminary discussion if there is a need to modify the Court's model PO.

We are available to discuss your two issues today at your earliest convenience. Let us know when you would like to chat.

Thanks!

Best regards,  
Edgar

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**Sent:** Tuesday, December 20, 2022 2:48 PM  
**To:** Edgar Gonzalez <[EGonzalez@pattersonsheridan.com](mailto:EGonzalez@pattersonsheridan.com)>; Kelly Ransom <[Kelly.Ransom@kellyhart.com](mailto:Kelly.Ransom@kellyhart.com)>; Caitlyn Hubbard <[Caitlyn.Hubbard@kellyhart.com](mailto:Caitlyn.Hubbard@kellyhart.com)>  
**Cc:** Todd Patterson <[TPatterson@pattersonsheridan.com](mailto:TPatterson@pattersonsheridan.com)>; Jay Yates <[JYates@pattersonsheridan.com](mailto:JYates@pattersonsheridan.com)>; Kyrie Cameron <[KCameron@pattersonsheridan.com](mailto:KCameron@pattersonsheridan.com)>; Jordan Brown <[JBrown@pattersonsheridan.com](mailto:JBrown@pattersonsheridan.com)>; Garrett Anderson <[GAnderson@pattersonsheridan.com](mailto:GAnderson@pattersonsheridan.com)>; Matt Graham <[MGraham@pattersonsheridan.com](mailto:MGraham@pattersonsheridan.com)>; Angela Grohs <[AGrohs@pattersonsheridan.com](mailto:AGrohs@pattersonsheridan.com)>  
**Subject:** RE: [CloudofChange v. Clover] Draft Agreed Protective Order

<image001.jpg>

We are always happy to speak with you folks, but we do not understand either aspect of your meet and confer request. With respect to the deposition notices, what issue, in your view, is ripe for a meet and confer?

We will promptly consider and discuss with our client the case wide PO you tendered last night, but our receiving a meet and confer request along with the first tender of a PO seems out of the ordinary. What is your thinking there?

We have two issues of our own. Do you oppose an extension to respond to your amended complaint through and including January 25, 2023.

Finally, will you join with us in requesting a zoom hearing on our motion to stay as soon as the Court deems appropriate?

Thank you.

J. Stephen Ravel  
Partner, Austin Office

---

<image002.png>  
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**From:** Edgar Gonzalez <[EGonzalez@pattersonsheridan.com](mailto:EGonzalez@pattersonsheridan.com)>  
**Sent:** Monday, December 19, 2022 10:01 PM  
**To:** Steve Ravel <[steve.ravel@kellyhart.com](mailto:steve.ravel@kellyhart.com)>; Kelly Ransom <[Kelly.Ransom@kellyhart.com](mailto:Kelly.Ransom@kellyhart.com)>; Caitlyn Hubbard <[Caitlyn.Hubbard@kellyhart.com](mailto:Caitlyn.Hubbard@kellyhart.com)>  
**Cc:** Todd Patterson <[TPatterson@pattersonsheridan.com](mailto:TPatterson@pattersonsheridan.com)>; Jay Yates <[JYates@pattersonsheridan.com](mailto:JYates@pattersonsheridan.com)>; Kyrie Cameron <[KCameron@pattersonsheridan.com](mailto:KCameron@pattersonsheridan.com)>; Jordan Brown <[JBrown@pattersonsheridan.com](mailto:JBrown@pattersonsheridan.com)>; Garrett Anderson <[GAnderson@pattersonsheridan.com](mailto:GAnderson@pattersonsheridan.com)>; Matt Graham <[MGraham@pattersonsheridan.com](mailto:MGraham@pattersonsheridan.com)>; Angela Grohs <[AGrohs@pattersonsheridan.com](mailto:AGrohs@pattersonsheridan.com)>  
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Counsel,

Please let us know if you are available to meet and confer tomorrow morning regarding the attached draft protective order. The attached draft protective order is identical in substance to the Court's model protective order.

Additionally, we would like to meet and confer regarding our previously served deposition notices (attached).

Best regards,  
Edgar

**Edgar Gonzalez** • Associate  
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